



Kevin Fritz  
Partner  
Direct (212) 655-3570  
kaf@msf-law.com

July 31, 2025

**VIA ECF**

Hon. Lewis J. Liman  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1620  
New York, NY 10007

**Re: *Lively v. Wayfarer Studios LLC et al.*, No. 1:24-cv-10049-LJL;  
*Jones et al. v. Abel et al.*, No. 1:25-cv-00779-LJL**

Dear Judge Liman:

As counsel for Wayfarer Studios LLC, Justin Baldoni, Jamey Heath, Steve Sarowitz, It Ends With Us Movie LLC, Melissa Nathan, The Agency Group PR LLC, and Jennifer Abel (collectively, the “Wayfarer Parties”), and pursuant to Your Honor’s Individual Rules, we move for continued sealing of Exhibit A (Dkt. 494-1) to Blake Lively’s motion for alternative service upon Robb Sullivan (Dkt. 492), who was an editor of the film *It Ends With Us* (the “Film”).

Exhibit A, which is a text chain discussing Blake Lively’s efforts to take control of certain aspects of the Film and citing from her 17-point list of demands, contains telephone numbers and/or email addresses of certain Wayfarer Parties and non-parties. *See In re Keurig Green Mt. Single-Serve Coffee Antitrust Litig.*, No. 14-MC-2542 (VSB), 2023 WL 196134, at \*12 (S.D.N.Y. Jan. 17, 2023) (redaction of names, emails, and phone numbers of non-party individual employees of Keurig was warranted); *In re Zyprexa Products Liab. Litig.*, No. MDL1596JBWASC, 2005 WL 2237789, at \*2 (E.D.N.Y. Mar. 2, 2005) (redaction of “confidential personal contact information such as home telephone numbers and addresses, pager and personal cell phone numbers, Social Security numbers” of Lilly’s non-party employees was warranted).

Accordingly, the Wayfarer Parties respectfully request that Exhibit A (Dkt. 494-1) is permanently sealed. Submitted herewith is a redacted version of Exhibit A, with the telephone numbers and email addresses redacted.

Respectfully submitted,

/s/ Kevin Fritz

MEISTER SEELIG & FEIN PLLC

Mitchell Schuster

Kevin Fritz

125 Park Avenue, 7<sup>th</sup> Floor

New York, NY 10017

Tel: (212) 655-3500

Email: [ms@msf-law.com](mailto:ms@msf-law.com)  
[kaf@msf-law.com](mailto:kaf@msf-law.com)

LINER FREEDMAN TAITELMAN + COOLEY, LLP

Bryan J. Freedman (*pro hac vice*)

Ellyn S. Garofalo (*pro hac vice*)

Miles M. Cooley (*pro hac vice*)

Theresa M Troupson (*pro hac vice*)

Summer Benson (*pro hac vice*)

Jason Sunshine

1801 Century Park West, 5<sup>th</sup> Floor

Los Angeles, CA 90067

Tel: (310) 201-0005

Email: [bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)  
[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)  
[mcooley@lftcllp.com](mailto:mcooley@lftcllp.com)  
[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)  
[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)  
[jsunshine@lftcllp.com](mailto:j sunshine@lftcllp.com)

Mitra Ahouraian (*pro hac vice*)

2029 Century Park East

4th Floor

Los Angeles, CA 90067

(310) 376-7878

Email: [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com)

cc: all counsel of record (via ECF)